



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

DATE: August 23, 2022

SUBJ: Site Investigation Closure Memorandum
East Millinocket Paper Mill Site – Boiler House
50 Main Street
East Millinocket, Maine 04430

FROM: Wing Chau, On-Scene Coordinator
Emergency Response and Removal Section II

THRU: William Lovely, Chief
Emergency Response and Removal Section II

TO: East Millinocket Paper Mill Site File

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the East Millinocket Paper Mill Site - Boiler House (“Site”) in East Millinocket, Maine. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release
 - a. The Removal Site Evaluation consisted of the following actions:
 - i. Review of information package submitted with MEDEP’s March 31, 2022 formal request for assistance to EPA’s EPRB.
 - ii. Review of chemical inventory and waste profiles developed by Karma Environmental that were provided to the Town of East Millinocket and MEDEP.
 - iii. Preliminary assessment conducted during the site walk on May 25, 2022 by EPA and START. Also in attendance during the site walk were representatives from MEDEP, Katahdin KI 50 (the former property owner),

Karma Environmental, and multiple East Millinocket Town officials, many of whom previously worked at the plant.

- iv. The Site Investigation on June 27 and 28, 2022.
 - v. Generating a PA/SI report by EPA's contractor, titled *Removal Program Preliminary Assessment/Site Investigation Report for the East Millinocket Paper Mill Site*, dated August 2022
- b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released, or for which there is threat of release, include but are not necessarily limited to the list below:

**Hazardous Substances or
Pollutants or Contaminants**

Media

Corrosive chemicals	ASTs, 250-gallon totes, 55-gallon drums
PCBs	55-gallon drums
VOCs [Naphthalene]	55-gallon drums

2. Evaluation of the threat to public health, welfare and the environment conducted by:

- a. Federal Agency for Toxic Substances and Disease Registry

Other: _____

Threat No Threat Evaluation Not Necessary

- b. Endangerment to the ecosystem:

Threat No Threat Evaluation Not Necessary

3. If it has been determined that a removal action is **not** warranted under CERCLA, please proceed to 3a, and mark the appropriate boxes.

If it has been determined that a removal action **is** warranted under CERCLA, please proceed to 3b, and mark the box.

- a. There is no release.

The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.

The release involves neither a hazardous substance nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.

It is subject to the limitations on response specified in 300.400(b)(1) through (3):

The release is of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.

The release is from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.

The release into public or private drinking water supplies due to deterioration of the system through ordinary use.

The amount, quantity, or concentration released does not warrant a Federal response.

A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.

b. The Removal Site Evaluation is complete and a removal action is warranted.

4. As reflected in Section 3 above, the Removal Site Evaluation was completed and a removal action **is** warranted. Regardless of the determination, one or more of the factors listed below, found in Section 300.415(b)(2) of the NCP, may be applicable to this Site.

a. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Actual or potential contamination of drinking water supplies or sensitive ecosystems.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.

High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

Threat of fire or explosion.

The availability of other appropriate Federal or State response mechanisms to respond to the release.

Other situations or factors that may pose threats to public health or welfare of the United States or the environment.

- b. The purpose of this memorandum is to document the determination that a removal action **is** warranted under section 300.415 of the NCP.

The June 2022 PA/SI sampling results have documented the presence of corrosive acids and bases, VOCs such as naphthalene, and PCBs. These hazardous substances/chemicals are currently stored in abandoned ASTs, 250-gallon totes, wrangler boxes, 55-gallon drums, and other various smaller containers. Despite most of the chemicals being staged or stored inside the buildings, the buildings are not secured and the large overhead doors to these buildings are not operational and are currently wide open. These containers and ASTs are subjected to the seasonal freeze/thaw cycles which could further compromise the integrity of the containers.

- c. If a removal action **is** warranted and in light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action as this Site is:

Emergency Time-Critical Non Time-Critical N/A

5. As reflected in Section 3 above, the Removal Site Evaluation has been concluded and it has been determined that a removal action under CERCLA **is** warranted. Section 5 below documents whether a release or potential threat of release under CWA, as amended by OPA, has been determined.

- a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.

There is release, or potential threat of release, as governed by the CWA as amended by OPA.

There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.

- b. The absence of the conditions specified in Section 5a, above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP **is not** necessary.
- cc: William Lovely Chief, Emergency Response and Removal Section II, SEMD (w/o attachments)
Ross Gilleland, Chief, Remedial Policy, Contracts, and Site Assessment Section, SEMD (w/o attachments)
Natividad Figueroa, EPRB, SEMD (w/o attachments)
Jonathan Onufryk, EPRB, SEMD (w/o attachments)
Scott Leighton, MEDEP
Michael Michaud, Town of East Millinocket
Jason Inoff, Katahdin KI 50 LLC

Encl: PA/SI Report